

### REMARKS

In the Office Action dated August 27, 2003, the Examiner rejected claims 23-26 under 35 U.S.C. § 112, second paragraph, as being indefinite for a lack of antecedent basis. The Applicant has amended the claims to overcome this § 112 rejection, and respectfully requests that the Examiner withdraw the rejection.

The Examiner also rejected claims 1-14 and 21-26 under 35 U.S.C. § 103 as being unpatentable over *Gellert* (U.S. Patent No. 4,648,546) in view of *Obrebski et al.* (U.S. Patent No. 2,871,886). Applicant respectfully submits that neither *Gellert* nor *Obrebski et al.*, alone or in combination with another reference, discloses, teaches, or suggests the presently claimed invention for the reasons given below.

The Examiner correctly notes in the Office Action that *Gellert* does not teach placing hot runner system components into stock, or removing hot runner system components from stock for modifications that correspond to specifications of customer orders. Contrary to the Examiner's statements, however, *Obrebski et al.* also fail to disclose or teach such steps. *Obrebski et al.* disclose manufacturing manifold plates from aluminum "stock." But, *Obrebski et al.* does not disclose, teach, or suggest partially manufacturing hot runner system components (from raw materials) in a first phase, placing them in stock, taking customer orders for hot runner systems, removing the components from stock, and further manufacturing or modifying the hot runner system components in accordance with the specifications of the customer orders in a second phase.

Apparently, the Examiner's citation of *Obrebski et al.* is based on a misunderstanding of

the term "stock" as it is used by *Obrebski et al.* and the present application. As explained to the Examiner during the personal interview, one definition of the term "stock" is "a supply accumulated for future use; a store." *American Heritage Dictionary (1998)*, p. 1336. This is the definition of the term "stock" that is used in the present application. Another definition of the term "stock" is "the raw material out of which something is made." *Id.* This is the definition of the term "stock" used by *Obrebski et al.* Thus, it is clear that while *Obrebski et al.* disclose making manifold plates from "raw material," *Obrebski et al.* do not disclose "accumulating a supply" or "storing" partially manufactured manifold plates or other hot runner system components. Nevertheless, to avoid any confusion over the use of the term "stock," Applicant has amended the claims to use the term "inventory" instead of "stock."

All of the currently pending claims recite methods for manufacturing hot runner system components, placing them into inventory, accepting customer orders for hot runner systems, and removing the components from inventory for modifications or further manufacturing of the hot runner systems that correspond to specifications of customer orders. As a result, the presently claimed invention allows a customer a wide range of flexibility with respect to hot runner system configurations, while providing a very fast manufacturing method for the hot runner system ordered by the customer.

Such an expedient manufacturing method has never been done before in the hot runner industry. On the contrary, due to the customization and complex engineering associated with hot runner systems, it has traditionally taken 6-8 weeks at least, and frequently even longer, to engineer, manufacture, and assemble hot runner systems. Indeed, the traditional method for engineering, manufacturing, and assembling hot runner systems is to wait for a customer to place

an order, and then completely engineer, manufacture, and assemble the customer's specified hot runner system from scratch. The engineering, designing, tooling, machining, and assembling involved in such a process takes several weeks, if not months, to complete. For obvious reasons, there has been a great demand in the hot runner industry for dramatically reducing the time it takes to engineer, manufacture, and assemble hot runner systems based on customers' specific design criteria. The present invention has satisfied this customer demand by engineering, manufacturing, and assembling hot runner systems in a much shorter period of time – only a few days – than traditional methods, while still allowing customers flexibility in choosing their design parameters.

In accordance with the Examiner's suggestion during the last personal interview, a declaration discussing hot runner systems, the traditional manufacturing process for hot runner systems, the need for a reduction in the time it takes to engineer, manufacture, and assemble hot runner systems, and the industry acceptance received by the Assignee of the present application in fulfilling this need is being submitted herewith. The declaration has been executed by Terry Schwenk, Sales Manager for North America for Mold-Masters Limited ("MML"), the Assignee of the present patent application, who has 29 years experience in the plastics manufacturing industry, including 16 years of experience in the hot runner industry.

In light of the above amendments and remarks, it is clear that neither *Gellert* nor *Obrebski et al.*, alone or in combination, anticipates or renders obvious the present claims. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejections of the claims under 35 U.S.C. § 103. Applicant believes the present claims to be in condition for allowance, and earnestly request early notification of same.

If, for any reason, the Examiner is unable to allow the application on the basis of this amendment and feels that a telephone conference would help clear up any unresolved matters, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,  
McDONNELL BOEHNEN  
HULBERT & BERGHOFF



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Dated: November 26, 2003

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